

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
BMI OLDCO INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 23-90794 (MI)
	:	
Debtors.	:	<b>(Jointly Administered)</b>
	:	
	X	

**TWELFTH MONTHLY FEE STATEMENT  
OF LATHAM & WATKINS LLP FOR COMPENSATION  
FOR SERVICES RENDERED AND FOR REIMBURSEMENT  
OF EXPENSES INCURRED AS BANKRUPTCY CO-COUNSEL TO THE DEBTORS  
FOR THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Name of Applicant:</b>	Latham & Watkins LLP
<b>Applicant's Role in Case:</b>	Bankruptcy co-counsel to the Debtors (as defined below)
<b>Date of Retention:</b>	November 21, 2023, effective as of October 2, 2023 [Docket No. 312]
<b>Period Covered by this Statement:</b>	September 1, 2024 through September 30, 2024
<b>Summary of Total Fees and Expenses Requested:</b>	
<b>Total fees requested in this statement:</b>	<b>\$478,222.00 (80% = \$382,577.60)</b>
<b>Total expenses requested in this statement:</b>	<b>\$73,418.01</b>
<b>Total fees and expenses requested in this statement (inclusive of holdback amount):</b>	<b>\$551,640.01</b>
<b>Summary of Attorney Fees Requested:</b>	
<b>Total attorney fees requested in this statement:</b>	<b>\$475,334.50</b>
<b>Total actual attorney hours covered by this statement:</b>	<b>304.40</b>
<b>Average hourly rate for attorneys:</b>	<b>\$1,561.55</b>

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: BMI Oldco Inc. (f/k/a Barretts Minerals Inc.) (8715) and Barretts Ventures Texas LLC (0787). The Debtors' address is 5605 North MacArthur Boulevard, Suite 1000, PMB 139, Irving, Texas 75038.

Summary of Paraprofessional Fees Requested:	
Total paraprofessional fees requested in this statement:	\$2,887.50
Total actual paraprofessional hours covered by this statement:	5.50
Average hourly rate for paraprofessionals:	\$525.00

This is the twelfth monthly fee statement.

**In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 316], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount equal to 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 316] (the “**Interim Compensation Order**”), Latham & Watkins LLP (“**L&W**”) hereby submits this twelfth monthly fee statement (this “**Fee Statement**”) for compensation for services rendered and reimbursement of expenses as bankruptcy co-counsel to the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”). By this Fee Statement, L&W requests payment with respect to the sums of \$382,577.60 as compensation for reasonable and necessary legal services (*i.e.*, 80% of \$478,222.00) and \$73,418.01 for reimbursement of actual and necessary expenses, for a total of \$455,995.61 for the period from September 1, 2024 through and including September 30, 2024 (the “**Compensation Period**”).

**ITEMIZATION OF SERVICES RENDERED AND EXPENSES INCURRED**

1. In support of this Fee Statement, attached are the following exhibits:

- **Exhibit A** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by L&W partners, counsel, associates, and paraprofessionals during the Compensation Period with respect to each of the project categories L&W established in accordance with its internal billing procedures.
- **Exhibit B** is a schedule providing certain information regarding the L&W attorneys and paraprofessionals for whose work on these chapter 11 cases compensation is sought in this Fee Statement. L&W attorneys and paraprofessionals have expended a total of **309.90** hours in connection with these chapter 11 cases during the Compensation Period.
- **Exhibit C** is a schedule setting forth the total amount of reimbursement sought for the Compensation Period with respect to each category of expenses for which L&W is seeking reimbursement in this Fee Statement.
- **Exhibit D** consists of L&W's detailed records of fees incurred during the Compensation Period.
- **Exhibit E** consists of L&W's detailed records of expenses incurred during the Compensation Period.

2. Although every effort has been made to include all fees and expenses incurred during the Compensation Period, some fees and expenses might not be included in this Fee Statement due to delays caused by accounting and processing during the Compensation Period. L&W reserves the right to seek allowance of such fees and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, Bankruptcy Local Rules, and the Interim Compensation Order.

**NOTICE**

3. Pursuant to the Interim Compensation Order, notice of this Fee Statement will be provided to the following parties: (i) counsel to the Debtors, (a) Latham & Watkins LLP, 355 South Grand Avenue, Suite 100, Los Angeles, CA 90071 (Attn: Shawn Hansen (shawn.hansen@lw.com)) and (b) Porter Hedges LLP, 1000 Main Street, 36th Floor, Houston, TX

77002 (Attn: John F. Higgins and Megan Young-John (jhiggins@porterhedges.com and myoung-john@porterhedges.com)); (ii) counsel to the Unsecured Creditors Committee, (a) Brown Rudnick LLP, Seven Times Square, New York, New York 10036 (Attn: David J. Molton (dmolton@brownrudnick.com) and Eric R. Goodman (egoodman@brownrudnick.com)), (b) Steptoe LLP, 717 Texas Avenue, Suite 2800, Houston, TX 77002 (Attn: Craig Smyser (csmyser@steptoe.com) and Jarod R. Stewart (jstewart@steptoe.com)) and (c) Caplin & Drysdale, Chartered, One Thomas Circle NW, Suite 1199, Washington, DC 20005 (Attn: Kevin C. MacLay (kmacLay@capdale.com) and Todd E. Phillips (tphillips@capdale.com)); (iii) counsel to the FCR, (a) Stutzman, Bromberg, Esserman & Plifka, P.C., 2323 Bryan Street, Suite 2200, Dallas, TX 75201 (Attn: Peter C. D'Apice (d'apice@sbep-law.com)) and (b) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Ryan Bartley (RBartley@ycst.com)); (iv) counsel to DIP Lender, Hughes Hubbard & Reed LLP, 1 Battery Park Plaza, New York, New York 10004 (Attn: Christopher Kiplok (christopher.kiplok@hugheshubbard.com), Erin Diers (erin.diers@hugheshubbard.com), and Steven Greene (steven.greene@hugheshubbard.com)); and (v) the Office of the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, TX 77002 (Attn: Vianey Garza (vianey.garza@usdoj.gov) and Hector Duran (hector.duran@usdoj.gov)).

*[Remainder of page intentionally left blank]*

WHEREFORE, L&W respectfully requests compensation and reimbursement of its expenses incurred during the Compensation Period in the total amount of \$455,995.61, consisting of (i) \$382,577.60, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by L&W, and (ii) \$73,418.01, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: October 25, 2024

Respectfully Submitted,

/s/ Jeffrey E. Bjork

**LATHAM & WATKINS LLP**

Jeffrey E. Bjork (admitted *pro hac vice*)

Kimberly A. Posin (admitted *pro hac vice*)

Shawn P. Hansen (admitted *pro hac vice*)

355 South Grand Avenue, Suite 100

Los Angeles, CA 90071

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1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 906-1200

Email: anu.yerramalli@lw.com

*Counsel for the Debtors and Debtors in Possession*

**Exhibit A****Compensation by Project Category**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	13.30	\$21,506.50
Claims Administration/Objections	1.50	\$2,110.50
Corporate Governance and Board Matters	16.20	\$29,282.50
Creditors Committee Matters	0.80	\$1,628.00
Environmental Matters	15.10	\$20,594.50
Financing	4.80	\$6,424.00
Litigation	165.90	\$278,346.00
Plan and Disclosure Statement	6.30	\$9,100.50
Reports and Schedules	0.50	\$637.50
Retention/Fee Matters (L&W)	9.20	\$7,833.00
Retention/Fee Matters/Objections (Others)	2.60	\$3,315.00
Asset Analysis and Recovery	73.70	\$97,444.00
<b>Total</b>	<b>309.90</b>	<b>\$478,222.00</b>

**Exhibit B**  
**Compensation by Professional**

<b>Name of Professional</b>	<b>Position of the Applicant; Year of Obtaining License to Practice; Department</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Bjork, Jeffrey E.	Partner. Joined firm in 2018. Member of the California Bar since 1998. Member of Restructuring Department.	\$2,240.00	55.60	\$124,544.00
Posin, Kimberly A.	Partner. Joined firm in 2002. Member of the California Bar since 2002. Member of Restructuring Department.	\$2,035.00	31.10	\$63,288.50
Craige, Christina M.	Counsel. Joined firm in 2019. Member of the California Bar since 2007. Member of the District of Columbia Bar since 2022. Member of Restructuring Department.	\$1,605.00	32.90	\$52,804.50
Potash, Aron	Partner. Joined firm in 2007. Member of the California Bar since 2007. Member of Corporate Department.	\$1,495.00	6.10	\$9,119.50
Quartarolo, Amy	Partner. Joined firm in 2002. Member of the California Bar since 2002. Member of Litigation Department.	\$1,495.00	34.70	\$51,876.50
Kermanian, Cody M.	Associate. Joined firm in 2018. Member of the California Bar since 2018. Member of Corporate Department.	\$1,275.00	9.00	\$11,475.00
Weichselbaum, Jonathan J.	Associate. Joined firm 2018. Member of the New York Bar since 2018. Member of Restructuring Department.	\$1,275.00	22.20	\$28,305.00
Teresi, Joseph L.	Associate. Joined firm in 2019. Member of the California Bar since 2019. Member of Litigation Department.	\$1,225.00	102.30	\$125,317.50
Gulati, Nikhil A.	Associate. Joined firm in 2022. Member of the New York Bar since 2023. Member of Restructuring Department.	\$890.00	4.80	\$4,272.00
Klabo, Davis A.	Associate. Joined firm in 2023. Member of the California Bar since 2023. Member of Restructuring Department.	\$760.00	5.70	\$4,332.00
Tarrant, Christopher M.	Senior Paralegal. Joined firm in 2022.	\$525.00	5.50	\$2,887.50

**Grand Total**  
**Total Hours**  
**Blended Rate**

**\$478,222.00**  
**309.90**  
**\$1,543.15**

<sup>1</sup> All non-working travel time has been billed at 50% of the normal hourly rate.

**Exhibit C****Expense Summary**

<b>Expense Category</b>	<b>Total Expenses</b>
Airfare	\$1,946.47
Court Research	\$66.30
Ground Transportation - Out-Of-Town	\$1,032.16
Lodging - Out of Town	\$1,575.00
Meals - Out-of-Town	\$478.58
Outside Services - Non-Attorney	\$62,593.00
Practice Support	\$5,710.50
Wireless Data	\$16.00
<b>Total</b>	<b>\$73,418.01</b>



**Exhibit D**

**Fee Statement**

1271 Avenue of the Americas  
 New York, New York 10020-1303  
 Tel: +1.212.906.1200 Fax: +1.212.751.4864  
 www.lw.com

# LATHAM & WATKINS LLP

## INVOICE

October 24, 2024

BMI Oldco Inc.  
 5605 North MacArthur Boulevard, Suite 1000  
 PMB 139  
 Irving, TX 75038  
 Attn: David Gordon

Please identify your payment with the following:

Invoice No. 2400615951  
 Matter Number 072806-1000

For professional services rendered through September 30, 2024

	Services	Costs	Total
Asset Analysis and Recovery	97,444.00		\$ 97,444.00
Case Administration	21,506.50		21,506.50
Claims Administration/Objections	2,110.50		2,110.50
Corporate Governance and Board Matters	29,282.50		29,282.50
Creditors Committee Matters	1,628.00		1,628.00
Environmental Matters	20,594.50		20,594.50
Financing	6,424.00		6,424.00
Litigation	278,346.00		278,346.00
Plan and Disclosure Statement	9,100.50		9,100.50
Reports and Schedules	637.50		637.50
Retention/Fee Matters (L&W)	7,833.00		7,833.00
Retention/Fee Matters/Objections (Others)	3,315.00		3,315.00
Total Services and Costs	478,222.00	0.00	\$ 478,222.00

<b>Total Due</b>	<b>\$ 478,222.00</b>
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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951  
 October 24, 2024

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J E Bjork	55.60	Hrs. @	\$ 2,240.00/hr.	\$ 124,544.00
KA Posin	31.10	Hrs. @	\$ 2,035.00/hr.	\$ 63,288.50
A Potash	6.10	Hrs. @	\$ 1,495.00/hr.	\$ 9,119.50
A Quartarolo	34.70	Hrs. @	\$ 1,495.00/hr.	\$ 51,876.50
C M Craige	32.90	Hrs. @	\$ 1,605.00/hr.	\$ 52,804.50
C M Kermanian	9.00	Hrs. @	\$ 1,275.00/hr.	\$ 11,475.00
J J Weichselbaum	22.20	Hrs. @	\$ 1,275.00/hr.	\$ 28,305.00
J L Teresi	102.30	Hrs. @	\$ 1,225.00/hr.	\$ 125,317.50
K D Shang	4.80	Hrs. @	\$ 890.00/hr.	\$ 4,272.00
D A Klabo	5.70	Hrs. @	\$ 760.00/hr.	\$ 4,332.00
C M Tarrant	<u>5.50</u>	Hrs. @	\$ 525.00/hr.	<u>\$ 2,887.50</u>
	309.90			\$ 478,222.00

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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951

October 24, 2024

Matter Name: Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/03/24	A Quartarolo	2.40	3,588.00	Telephone conference with K. Posin regarding discussion with K. Collins (0.5); prepare materials for discussion with K. Collins (1.7); email J. Teresi regarding same (0.2)
09/05/24	A Quartarolo	3.40	5,083.00	Prepare for (0.8) and attend discussions with K. Collins and D. Gordon regarding estate claims and related issues (1.8); review and revise presentation materials (0.8)
09/05/24	J L Teresi	1.50	1,837.50	Attend special committee meeting
09/12/24	KA Posin	.20	407.00	Draft emails to J. Higgins and A. Quartarolo regarding special committee
09/12/24	A Quartarolo	1.70	2,541.50	Email J. Higgins regarding estate claims and related issues (0.3); review research regarding same (1.4)
09/12/24	J L Teresi	1.40	1,715.00	Review documents related to investigation into estate causes of action
09/12/24	J J Weichselbaum	.20	255.00	Finalize/execution of consent appointing special committee
09/13/24	A Quartarolo	.30	448.50	Email J. Teresi regarding special committee and related analysis
09/13/24	J L Teresi	1.70	2,082.50	Review documents regarding investigation into estate causes of action (1.3); emails with Latham team regarding same (0.4)
09/17/24	KA Posin	1.00	2,035.00	Attend call with Latham team and Porter Hedges team regarding special committee investigation
09/17/24	A Quartarolo	.80	1,196.00	Email and telephone conference with J. Teresi regarding special committee and estate claims
09/17/24	J L Teresi	9.20	11,270.00	Conference with J. Higgins, A. Quartarolo, K. Posin, H. Hatfield, E. Wade, and S. Johnson regarding investigation into estate causes of action (1.0); draft documents related to special committee investigation (0.3); conference with A. Quartarolo regarding investigation in estate causes of action (0.4); conduct investigation into estate causes of action (5.2); prepare presentation regarding the same (2.3)
09/18/24	J E Bjork	.50	1,120.00	Prepare for special committee meeting
09/18/24	J L Teresi	7.30	8,942.50	Continue conducting investigation into estate causes of action (4.2); continue preparing presentation regarding the same (3.1)

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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951

October 24, 2024

Matter Name: Asset Analysis and Recovery

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/19/24	A Quartarolo	2.40	3,588.00	Review and revise special committee presentation materials (2.1); email J. Teresi regarding same (0.3)
09/19/24	J L Teresi	4.50	5,512.50	Continue investigating estate causes of action (2.1); continue preparing for special committee meeting (2.4)
09/20/24	KA Posin	1.00	2,035.00	Attend special committee meeting
09/20/24	A Quartarolo	1.00	1,495.00	Attend special committee meeting
09/20/24	C M Craige	1.00	1,605.00	Participate in special committee meeting
09/20/24	J L Teresi	5.00	6,125.00	Prepare for (4.0) and attend special committee meeting (1.0)
09/23/24	J L Teresi	4.60	5,635.00	Conduct investigation into estate causes of action (4.1); conference with A. Quartarolo regarding the same (0.5)
09/24/24	J L Teresi	7.00	8,575.00	Correspond with M3 regarding investigation into estate causes of action (0.4); conduct investigation into estate causes of action (6.6)
09/25/24	J L Teresi	6.60	8,085.00	Conduct investigation into estate causes of action (6.2); emails with Latham team regarding same (0.4)
09/26/24	J L Teresi	2.10	2,572.50	Continue conducting investigation of estate causes of action
09/27/24	KA Posin	.90	1,831.50	Attend portion of special committee meeting
09/27/24	A Quartarolo	1.90	2,840.50	Telephone conference with J. Teresi regarding special committee meeting (0.4); prepare for (0.5) and attend special committee meeting (1.0)
09/27/24	J L Teresi	4.10	5,022.50	Prepare for (0.5) and attend special committee meeting (0.9); conference with A. Quartarolo regarding the same (0.5); continue preparing for special committee meeting (2.2)

J E Bjork	.50	Hrs. @	\$ 2,240.00/hr.	\$ 1,120.00
KA Posin	3.10	Hrs. @	\$ 2,035.00/hr.	\$ 6,308.50
A Quartarolo	13.90	Hrs. @	\$ 1,495.00/hr.	\$ 20,780.50
C M Craige	1.00	Hrs. @	\$ 1,605.00/hr.	\$ 1,605.00
J J Weichselbaum	.20	Hrs. @	\$ 1,275.00/hr.	\$ 255.00
J L Teresi	<u>55.00</u>	Hrs. @	\$ 1,225.00/hr.	<u>\$ 67,375.00</u>
	73.70			\$ 97,444.00

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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951

October 24, 2024

Matter Name: Case Administration

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/03/24	J J Weichselbaum	.30	382.50	Call with M3 regarding status of cases (0.2); call with Porter Hedges regarding status of cases (0.1)
09/04/24	KA Posin	.20	407.00	Converse with C. Kiplok and E. Diers regarding case status
09/05/24	KA Posin	.30	610.50	Attend weekly Latham team update call
09/05/24	C M Craige	.30	481.50	Participate in weekly Latham legal update call
09/05/24	J J Weichselbaum	.60	765.00	Participate in weekly team update call
09/06/24	KA Posin	.50	1,017.50	Attend weekly update call with D. Gordon and Latham team
09/06/24	A Quartarolo	.60	897.00	Telephone conference with D. Gordon regarding status and case strategy
09/06/24	C M Craige	.50	802.50	Participate in weekly legal update call with Latham team and Dave Gordon
09/06/24	J J Weichselbaum	.50	637.50	Participate in call with D. Gordon and Latham team to discuss status
09/10/24	KA Posin	.30	610.50	Attend legal update call
09/10/24	J J Weichselbaum	.40	510.00	Call with M3 team to discuss status (0.2); call with Porter Hedges team to discuss status (0.1); review Porter Hedges email regarding upcoming deadlines (0.1)
09/11/24	C M Craige	.30	481.50	Correspond with Latham team regarding recent case filing
09/12/24	KA Posin	.40	814.00	Attend weekly Latham team update call
09/12/24	C M Craige	.40	642.00	Participate in weekly legal update call
09/12/24	J J Weichselbaum	.40	510.00	Participate in team update call
09/16/24	KA Posin	.60	1,221.00	Attend call with D. Gordon regarding case update
09/17/24	KA Posin	.20	407.00	Attend weekly update call with M3 and J. Weichselbaum
09/17/24	J J Weichselbaum	.70	892.50	Call with Porter Hedges to discuss status of cases (0.3); call with M3 team to discuss status of cases (0.3); emails regarding court order regarding removal deadline (0.1)
09/19/24	KA Posin	.20	407.00	Converse with TLG regarding case status

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Invoice No. 2400615951

October 24, 2024

Matter Name: Case Administration

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/20/24	KA Posin	1.20	2,442.00	Attend weekly update call with D. Gordon (0.6); attend weekly update call with Latham team (0.6)
09/20/24	C M Craige	.60	963.00	Participate in weekly update call with Latham team and D. Gordon
09/20/24	J J Weichselbaum	1.70	2,167.50	Participate in update call with Latham team and D. Gordon (0.6); participate in team weekly update call (0.7); review recent bankruptcy filing for case strategy (0.4)
09/24/24	J J Weichselbaum	.30	382.50	Call with Porter Hedges to discuss (0.2); review email regarding upcoming deadlines (0.1)
09/25/24	J J Weichselbaum	.30	382.50	Call with M3 to discuss status of case
09/26/24	KA Posin	.20	407.00	Draft email to J. Bjork regarding case status
09/27/24	KA Posin	.50	1,017.50	Attend weekly update call
09/27/24	J J Weichselbaum	.50	637.50	Participate in call with D. Gordon and Latham team to discuss status
09/28/24	KA Posin	.30	610.50	Draft response to D. Gordon regarding talc studies

KA Posin	4.90	Hrs. @	\$ 2,035.00/hr.	\$ 9,971.50
A Quartarolo	.60	Hrs. @	\$ 1,495.00/hr.	\$ 897.00
C M Craige	2.10	Hrs. @	\$ 1,605.00/hr.	\$ 3,370.50
J J Weichselbaum	<u>5.70</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 7,267.50</u>
	13.30			\$ 21,506.50

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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951

October 24, 2024

Matter Name: Claims Administration/Objections

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/11/24	J J Weichselbaum	.30	382.50	Review open issues on claims analysis (0.2); email Debtor regarding same (0.1)
09/20/24	J J Weichselbaum	.60	765.00	Call with Debtor regarding claims filed (0.2); review spreadsheet in advance (0.3); discuss same with N. Gulati (0.1)
09/23/24	C M Craige	.60	963.00	Research regarding source of talc
C M Craige	.60	Hrs. @	\$ 1,605.00/hr.	\$ 963.00
J J Weichselbaum	<u>.90</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 1,147.50</u>
	1.50			\$ 2,110.50

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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951

October 24, 2024

Matter Name: Corporate Governance and Board Matters

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/03/24	A Quartarolo	.30	448.50	Review and revise board minutes (0.2); email J. Weichselbaum regarding same (0.1)
09/03/24	C M Craige	.30	481.50	Call with Latham team regarding debtor corporate governance matter
09/03/24	J J Weichselbaum	1.30	1,657.50	Draft board minutes (0.5); incorporate comments to same (0.3); review comments to consent appointing committee (0.3); emails with K. Posin and A. Quartarolo regarding same (0.2)
09/04/24	KA Posin	.50	1,017.50	Review draft slide deck and provide comments on same (0.2); draft emails regarding calls with independent director (0.3)
09/04/24	J J Weichselbaum	.50	637.50	Revise written consent to incorporate comments
09/05/24	J E Bjork	2.50	5,600.00	Participate on Board and Debtor strategy calls related to plan and settlement issues
09/05/24	C M Craige	2.20	3,531.00	Participate in calls regarding investigation of estate claims
09/06/24	A Quartarolo	1.20	1,794.00	Draft board materials
09/09/24	KA Posin	.30	610.50	Review revised board resolutions
09/09/24	J J Weichselbaum	.60	765.00	Revise written consent to incorporate comments from K. Posin (0.3); emails regarding same (0.2); circulate materials to Board (0.1)
09/11/24	KA Posin	.50	1,017.50	Attend board meeting
09/11/24	J J Weichselbaum	.70	892.50	Participate in Board call (0.5); emails regarding consent appointing special committee (0.1); prepare board agenda (0.1)
09/15/24	J E Bjork	.90	2,016.00	Emails with Latham team related to upcoming board meeting and review of board materials
09/15/24	KA Posin	.70	1,424.50	Review draft board resolutions and board meeting minutes and provide comments on same
09/16/24	J J Weichselbaum	.70	892.50	Draft Board minutes (September 11 board meeting)
09/17/24	J E Bjork	2.70	6,048.00	Prepare for board meeting and conference with Debtor (1.7); review materials in advance of same (1.0)
09/30/24	A Quartarolo	.30	448.50	Review and revise board meeting minutes (0.2); email K. Posin and J. Weichselbaum regarding same (0.1)

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Matter Name: Corporate Governance and Board Matters

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J E Bjork	6.10	Hrs. @	\$ 2,240.00/hr.	\$ 13,664.00
KA Posin	2.00	Hrs. @	\$ 2,035.00/hr.	\$ 4,070.00
A Quartarolo	1.80	Hrs. @	\$ 1,495.00/hr.	\$ 2,691.00
C M Craige	2.50	Hrs. @	\$ 1,605.00/hr.	\$ 4,012.50
J J Weichselbaum	<u>3.80</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 4,845.00</u>
	16.20			\$ 29,282.50

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Invoice No. 2400615951

October 24, 2024

Matter Name: Creditors Committee Matters

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/25/24	KA Posin	.20	407.00	Review fee materials
09/26/24	KA Posin	.60	1,221.00	Review fee summary (0.2); converse with Debtor regarding same (0.3); converse with J. Bjork regarding same (0.1)

KA Posin	<u>.80</u>	Hrs. @	\$ 2,035.00/hr.	<u>\$ 1,628.00</u>
	.80			\$ 1,628.00

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Invoice No. 2400615951

October 24, 2024

Matter Name: Environmental Matters

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/03/24	A Potash	.20	299.00	Review bond and permit tracking matrix (0.1); direct team as to next steps on transfers (0.1)
09/03/24	C M Kermanian	.30	382.50	Revise tracking matrix and correspond with Latham team regarding same
09/04/24	C M Kermanian	.30	382.50	Correspond with Latham team regarding bonds and guarantees
09/05/24	A Potash	.40	598.00	Confer with Riverspan and Hughes Hubbard as to bonds and indemnity (0.2); review updates on Hard Rock permit applications (0.2)
09/05/24	C M Kermanian	.30	382.50	Correspond with Riverspan and Dorsey regarding hard rock permits (0.2); update matrix regarding same (0.1)
09/06/24	A Potash	.60	897.00	Review Hard Rock supplemental information forms (0.2); confer with Buyer counsel as to same (0.1); emails with C. Kermanian regarding bonds and permit transfers (0.2); confer with Dorsey as to mining permit transfers (0.1)
09/06/24	C M Kermanian	1.00	1,275.00	Review revised hard rock supplemental information forms (0.7); correspond with Latham team regarding same (0.3)
09/09/24	A Potash	.50	747.50	Confer with C. Kermanian and Dorsey as to updates to Regal and Treasure forms (0.2); discuss bond documents with W. Lederer (0.1); review revisions to Hard Rock assignments (0.2)
09/09/24	C M Kermanian	1.40	1,785.00	Correspond with A. Potash regarding hard rock documents (0.1); review and revise same (0.3); correspond with Latham team regarding credit instruments (1.0)
09/11/24	A Potash	.80	1,196.00	Discuss with Riverspan, C. Kermanian, and Hughes Hubbard surety letter and draft reclamation bonds (0.3); review same (0.3); confer with C. Kermanian regarding amendment application (0.1); review permit tracker (0.1)
09/11/24	C M Kermanian	.30	382.50	Review correspondence regarding credit instruments and update tracking matrix
09/12/24	A Potash	.50	747.50	Confer with K. Brautigam regarding DEQ comments (0.1); review additional replacement bond (0.1); confer with C. Kermanian and S. Naturman as to same (0.2); review updates to indemnity letter (0.1)
09/12/24	C M Kermanian	2.00	2,550.00	Review replacement bonds, draft comments on same,

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Matter Name: Environmental Matters

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
				and correspond regarding same
09/13/24	A Potash	.40	598.00	Review updates on bond replacements, indemnity agreement, and permit transfers (0.3); confer with C. Kermanian as to same (0.1)
09/13/24	C M Kermanian	.60	765.00	Correspond with Latham team regarding draft replacement bonds, indemnity agreement, and update tracker regarding same
09/15/24	A Potash	.20	299.00	Review surety letter (0.1); confer with Riverspan as to same (0.1)
09/16/24	A Potash	.20	299.00	Confer with C Kermanian as to bond replacements and Debtor update
09/16/24	C M Kermanian	.50	637.50	Correspond with Latham team regarding indemnity agreement and bonds
09/18/24	A Potash	.20	299.00	Confer with Riverspan and C. Kermanian as to bond replacements and surety letter
09/18/24	C M Kermanian	.30	382.50	Correspond with Latham team regarding bond replacement and indemnity agreement
09/19/24	A Potash	.90	1,345.50	Discuss indemnity document, October 29th replacement deadline, and permits with W. Lederer and S. Naturman (0.3); review bond indemnity agreement (0.2); confer with C. Kermanian as to revised supplemental information forms, amendment applications, and regulator outreach (0.2); review and comment on bond and permit matrix (0.2)
09/19/24	C M Kermanian	.70	892.50	Correspond with Latham team regarding indemnity agreement, review same (0.4); correspond with Latham team regarding bonds and permit statuses and update diligence tracker (0.3)
09/20/24	A Potash	.50	747.50	Confer with K. Brautigam as to DEQ outreach (0.1); confer with C. Kermanian as to indemnity agreement (0.1); review revised bond documents (0.2); confer with W. Lederer as to same (0.1)
09/20/24	C M Kermanian	.40	510.00	Correspond with Latham team regarding indemnity agreement
09/22/24	A Potash	.30	448.50	Confer with Latham team as to bond replacements (0.1); review same (0.2)
09/23/24	A Potash	.20	299.00	Review updates on new bonds
09/23/24	C M Kermanian	.70	892.50	Review updated bond documents and correspond

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October 24, 2024

Matter Name: Environmental Matters

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
				regarding same (0.6); update bond and permit tracker (0.1)
09/27/24	A Potash	.20	299.00	Confer with Latham team as to bond replacements and permit transfers (0.1); review updates to tracking matrix (0.1)
09/27/24	C M Kermanian	.20	255.00	Correspond regarding permit transfers and call A. Potash regarding same
A Potash	6.10	Hrs. @	\$ 1,495.00/hr.	\$ 9,119.50
C M Kermanian	<u>9.00</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 11,475.00</u>
	15.10			\$ 20,594.50

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Invoice No. 2400615951  
 October 24, 2024  
 Matter Name: Financing

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/03/24	J J Weichselbaum	.40	510.00	Review cash report (0.2); emails regarding same (0.2)
09/04/24	J J Weichselbaum	.40	510.00	Review variance report (0.3); emails regarding same (0.1)
09/09/24	J J Weichselbaum	.30	382.50	Review and circulate cash report
09/10/24	J J Weichselbaum	.30	382.50	Review variance report
09/11/24	J J Weichselbaum	.20	255.00	Review and circulate variance report
09/16/24	J J Weichselbaum	.40	510.00	Review/circulate cash report
09/18/24	KA Posin	.20	407.00	Review variance report
09/18/24	J J Weichselbaum	.30	382.50	Review / circulate variance report
09/23/24	J J Weichselbaum	.60	765.00	Emails with M3 regarding DIP (0.2); call with HHR to discuss DIP (0.1); review and circulate cash report (0.3)
09/24/24	J J Weichselbaum	.20	255.00	Call regarding DIP matters (0.1); email K. Posin regarding same (0.1)
09/25/24	KA Posin	.20	407.00	Review variance report
09/25/24	J J Weichselbaum	.70	892.50	Review and circulate variance report (0.3); correspondence regarding DIP matters, including request to extend milestones (0.3); email Brown Rudnick regarding same (0.1)
09/30/24	J J Weichselbaum	.60	765.00	Review and circulate cash report (0.2); review borrowing notice and compliance certificate (0.3); correspondence regarding same (0.1)

KA Posin	.40	Hrs. @	\$ 2,035.00/hr.	\$ 814.00
J J Weichselbaum	<u>4.40</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 5,610.00</u>
	4.80			\$ 6,424.00

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Invoice No. 2400615951  
 October 24, 2024  
 Matter Name: Litigation

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/01/24	KA Posin	.50	1,017.50	Draft emails to J. Bjork and A. Quartarolo regarding claim analysis and mediation
09/02/24	J E Bjork	.60	1,344.00	Emails with Latham team related to plan mediation and, Pfizer mediation
09/03/24	J E Bjork	1.60	3,584.00	Participate on call with K. Feinberg (0.3); update call with Debtor (0.3); conference with Debtor regarding plan mediation and Pfizer mediation issues and strategy (1.0)
09/03/24	KA Posin	2.50	5,087.50	Summarize settlement data (2.0); converse with Latham team regarding litigation strategy (0.3); converse with A. Quartarolo regarding same (0.2)
09/03/24	C M Craige	.20	321.00	Correspond with A. Quartarolo, L. Keefer and K. Posin regarding claims questions
09/03/24	J L Teresi	1.10	1,347.50	Conference with L. McKown regarding claims data and discovery
09/04/24	J E Bjork	3.00	6,720.00	Prepare for meetings with Board (1.0); update conference with Debtor regarding strategic issues regarding mediation (1.1); emails with K. Feinberg (0.2); review plan structure materials (0.2); emails with mediator related to Pfizer mediation (0.3); review materials regarding same (0.2)
09/04/24	KA Posin	2.90	5,901.50	Attend call with HHR and A. Quartarolo regarding presentation (0.4); review email from D. Luce regarding settlement data (0.7); attend call with Stout, C. Craige and A. Quartarolo regarding claims database (1.0); review draft response to claims related inquiries from UCC (0.4); review revised settlement data (0.4)
09/04/24	A Quartarolo	2.10	3,139.50	Telephone conference with B. Franzoni regarding pending litigation and related issues (0.4); review mediation documents and analysis (0.8); telephone conference with Stout regarding same (0.9)
09/04/24	C M Craige	2.60	4,173.00	Correspond with HHR, Stout and Latham teams regarding litigation-related calls and logistics (0.6); analyze claims-related data for mediation (0.4); correspond with Latham team regarding same (0.2); participate in claims data call with Stout and Latham teams (1.0); revise UCC responses (0.4)
09/04/24	J L Teresi	4.50	5,512.50	Review documents related to claims data (0.8); correspond with Stout regarding the same (0.2); conference with. A. Quartarolo, L. Keefer, K. Posin, C.

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				Craige and R. Mishkin regarding claims data (1.1); revise claims data (1.3); correspond with practice support services regarding discovery documents (0.3); review documents related to discovery (0.8)
09/05/24	J E Bjork	1.50	3,360.00	Follow up discussion with Debtor related to Pfizer and plan strategy (1.0); conference with Debtor regarding plan issues (0.5)
09/05/24	KA Posin	2.40	4,884.00	Attend call with K. Collins and Latham team regarding claims (2.2); draft emails to Latham team regarding recurring calls (0.2)
09/05/24	J L Teresi	1.30	1,592.50	Correspondence with Stout regarding claims data (0.6); revise diligence responses (0.7)
09/05/24	D A Klabo	.60	456.00	Review and revise motion to dismiss case chart
09/05/24	K D Shang	.40	356.00	Update litigation trackers and correspondence regarding same
09/06/24	J E Bjork	1.40	3,136.00	Emails with K. Feinberg (0.2); update conference with Debtor regarding strategic mediation issues (1.2)
09/06/24	KA Posin	2.30	4,680.50	Converse with C. Cheng and mediation parties regarding mediation topics (0.5); review draft response to UCC requests (0.3); review revised response to UCC and draft emails to J. Teresi regarding same (0.5); review summary of settled cases (1.0)
09/06/24	A Quartarolo	1.30	1,943.50	Review claims data and related issues (0.5); email and telephone conference with J. Teresi regarding same (0.4); revise responses to mediation requests (0.3); email KK. Feinberg regarding same (0.1)
09/06/24	C M Craige	.80	1,284.00	Correspond with Stout and Latham teams regarding claims estimates (0.3); participate in mediation call with mediator, HHR, and Latham teams (0.5)
09/06/24	J L Teresi	4.60	5,635.00	Correspondence with Stout and Latham teams regarding claims data (0.4); revise claims data (0.3); revise responses regarding claims data (0.4); conference with A. Quartarolo regarding mediation (0.7); revise mediation response (0.4); attend to correspondence regarding claims data (0.6); review documents related to discovery (1.8)
09/06/24	D A Klabo	4.20	3,192.00	Research regarding motion to dismiss case chart (3.5); finalize motion to dismiss case chart (0.6); correspondence with D. Irgi, I. Ashworth, N. Gulati regarding same (0.1)

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09/07/24	J E Bjork	.50	1,120.00	Emails related to Pfizer settlement construct (0.2); email with Latham team update regarding mediation (0.3)
09/08/24	J E Bjork	.90	2,016.00	Review plan mediation-related materials and outline of open issues
09/09/24	J E Bjork	1.00	2,240.00	Review and respond to emails from Latham team related to Pfizer and plan mediation and file review regarding same (0.8); conference with Debtor regarding same (0.2)
09/09/24	KA Posin	.80	1,628.00	Review emails from Stout and J. Teresi regarding UCC requests (0.5); draft email to Latham team regarding Friday mediation session (0.3)
09/09/24	A Quartarolo	.20	299.00	Email J. Teresi regarding pending litigation and automatic stay
09/09/24	C M Craige	.40	642.00	Analyze claims data and related emails
09/09/24	J L Teresi	4.40	5,390.00	Correspondence with Stout regarding claims data (0.3); conference with L. Keefer regarding claims data (0.2); conference with L. McKown, D. Luce, and B. Franzoni regarding talc litigation (0.4); correspond with L. McKown regarding the same (0.3); review and revise claims data (1.1); correspond with L. Keefer regarding the same (0.5); continue reviewing claims data (0.6); correspond with L. Keefer and L. McKown regarding the same (0.4); review and revise claims data (0.6)
09/09/24	D A Klabo	.90	684.00	Finalize and circulate motion to dismiss case chart (0.7); correspondence with D. Irgi, I. Ashworth regarding same (0.2)
09/10/24	J E Bjork	1.70	3,808.00	Multiple emails with Debtor regarding strategic issues (0.5); participate on zoom call with Debtor regarding plan issues (0.6); review mediation-related materials in advance of mediation session (0.6)
09/10/24	KA Posin	.30	610.50	Review and respond to emails with Stout regarding data
09/10/24	A Quartarolo	.90	1,345.50	Review discovery (0.7); email J. Teresi regarding pending litigation (0.2)
09/10/24	C M Craige	2.10	3,370.50	Correspond with Latham and Stout teams regarding upcoming mediation session (0.6); correspond with Stout and Latham teams regarding same (0.3); call with J. Teresi regarding same (0.2); analyze precedent

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				filing (0.4); correspond with Latham team regarding same (0.6)
09/10/24	J L Teresi	2.90	3,552.50	Correspondence with L. Keefer, A. Quartarolo, and C. Craige regarding claims data (1.4); conference with C. Craige regarding the same (0.2); review and revise claims data (1.3)
09/11/24	J E Bjork	3.00	6,720.00	Multiple calls with Debtor regarding strategy and mediation issues (1.5); review materials in preparation for Zoom mediation session and conference with C. Kiplok (1.5)
09/11/24	KA Posin	.70	1,424.50	Attend call with Stout regarding mediation process (0.5); review responses to UCC questions (0.2)
09/11/24	C M Craige	.70	1,123.50	Participate in mediation prep call with Latham and Stout teams (0.5); correspond with Stout and Latham teams regarding same (0.2)
09/11/24	J L Teresi	5.30	6,492.50	Review claims data (0.2); conference with R. Mishkin, L. Keefer, K. Posin, and C. Craige regarding claims data (0.5); correspond with R. Goodings regarding discovery data (0.3); correspond with L. McKown regarding the same (0.3); review and revise claims data (1.4); draft and revise correspondence related to mediation (0.8); revise claims data (0.6); correspondence with L. Keefer regarding claims data (0.5); revise claims data (0.7)
09/12/24	J E Bjork	2.60	5,824.00	Multiple emails and calls with Debtors regarding settlement issues and mediation related matters for Pfizer and plan mediation (1.3); review related materials (1.3)
09/12/24	KA Posin	.20	407.00	Draft email to J. Bjork regarding litigation deadlines
09/12/24	A Quartarolo	2.10	3,139.50	Prepare mediation information exchange and analysis (1.7); email K. Feinberg regarding same (0.1); review materials on pending litigation (0.3)
09/12/24	C M Craige	.40	642.00	Correspond with Latham team regarding expert witnesses (0.1); correspond with Latham and Stout team regarding mediation materials (0.3)
09/12/24	J L Teresi	3.50	4,287.50	Review documents related to discovery (3.0); correspond with A. Quartarolo, B. Franzoni, and L. McKown regarding the same (0.5)
09/12/24	J J Weichselbaum	.30	382.50	Call with Brown Rudnick regarding depositions (0.1); review deposition notices (0.2)

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09/13/24	J E Bjork	4.90	10,976.00	Review materials in preparation for mediation (1.5); participate in mediation and review of prior proposals (1.5); follow up conference with K. Feinberg (0.6); follow up conference with Debtor (0.7); emails with Latham team related to update proposal and Atkinson claim review (0.6)
09/13/24	KA Posin	2.60	5,291.00	Attend mediation call with mediator (1.2); attend follow up call regarding mediation (0.4); attend call with A. Quartarolo and C. Craige regarding mediation materials (1.0)
09/13/24	A Quartarolo	2.90	4,335.50	Prepare for (0.4) and attend mediation session (0.8); correspondences and calls with Latham team and Debtors regarding same and related follow-up (1.7)
09/13/24	C M Craige	3.20	5,136.00	Participate in mediation session with Debtor,, Committee, FCR, and mediator (0.9); correspond with Latham, Stout and HHR teams regarding same (0.7); follow up call regarding same (0.2); call with K. Posin and A. Quartarolo regarding mediation deliverables (1.0); analyze materials regarding same (0.4)
09/13/24	J L Teresi	5.50	6,737.50	Correspond with A. Quartarolo and C. Craige regarding claims data (0.3); correspond with L. Keefer regarding the same (0.3); review documents related to discovery (4.9)
09/13/24	K D Shang	.60	534.00	Update litigation trackers (0.4); correspondence regarding same (0.2)
09/14/24	J E Bjork	1.00	2,240.00	Emails from mediator (0.2); review pleadings in response to motion to dismiss (0.5); emails related to Pfizer mediation (0.3)
09/15/24	J L Teresi	.80	980.00	Update litigation tracker
09/16/24	KA Posin	.30	610.50	Review response to mediation requests
09/16/24	A Quartarolo	1.90	2,840.50	Review of pending litigation (0.3); telephone conference with J. Teresi regarding same (0.2); review mediation analysis (1.3); email K. Feinberg regarding same (0.1)
09/16/24	C M Craige	2.10	3,370.50	Correspond with Latham team regarding Pfizer settlements (0.5); correspond with J. Bjork and K. Posin regarding mediation materials (0.2); call with J. Bjork regarding same (0.2); compile claims analysis (0.8); correspond with Latham and Stout teams regarding mediation materials (0.4)

BALANCE DUE AND PAYABLE TO REMITTANCE ADDRESS UPON RECEIPT.  
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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615951  
 October 24, 2024  
 Matter Name: Litigation

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/16/24	J L Teresi	3.60	4,410.00	Conference with B. Franzoni, A. Quartarolo, L. McKown, and D. Luce regarding litigation check in (0.7); update litigation tracker (0.3); draft call agenda (0.3); review and revise claims data (1.1); correspond with L. Keefer regarding the same (0.4); prepare and finalize claims data (0.4); review discovery documents (0.4)
09/17/24	KA Posin	.60	1,221.00	Attend call with mediation parties regarding case status (0.4); review emails from mediator (0.2)
09/17/24	C M Craige	.40	642.00	Correspond with mediator and Latham team regarding mediation materials (0.2); call with E. Diers regarding mediation (0.2)
09/17/24	J L Teresi	.60	735.00	Correspond with R. Goodings regarding discovery (0.2); review documents related to discovery (0.4)
09/18/24	J E Bjork	2.20	4,928.00	Conferences with Debtor regarding strategic issues (1.2); follow up conference with Debtor regarding plan issues (0.5); multiple emails with Latham team related to motion to dismiss (0.5)
09/18/24	A Quartarolo	.30	448.50	Correspondence regarding pending litigation (0.2); email J. Jonas regarding depositions (0.1)
09/18/24	C M Craige	.40	642.00	Correspond with L. Keefer and J. Teresi regarding estimation figures (0.3); correspond with A. Quartarolo regarding same (0.1)
09/18/24	J L Teresi	.80	980.00	Correspond with R. Goodings regarding discovery (0.2); correspond with L. McKown regarding talc litigation (0.2); review documents related to discovery (0.4)
09/19/24	J E Bjork	2.10	4,704.00	Multiple calls with Debtor regarding strategic issues and plan mediation process (0.9); review materials regarding same (1.2)
09/19/24	KA Posin	2.00	4,070.00	Attend call with Stout and Latham team regarding claims model (1.0); review revised claims model and draft emails regarding same (1.0)
09/19/24	A Quartarolo	1.60	2,392.00	Review mediation analysis (1.3); email with K. Posin and C. Craige regarding same (0.3)
09/19/24	C M Craige	2.80	4,494.00	Participate in zoom regarding estimation with Latham and Stout teams (1.0); correspond with Stout regarding estimation (0.2); correspond with Latham team regarding same (0.3); analyze revised claims model (1.0); revise litigation response letters (0.3)

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**LATHAM & WATKINS** LLP

Invoice No. 2400615951  
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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/19/24	J L Teresi	1.80	2,205.00	Correspond with L. McKown regarding underlying litigation (0.2); review documents related to the same (0.3); review new complaints from underlying talc litigations and update litigation tracker (0.6); review documents related to discovery (0.7)
09/19/24	K D Shang	.30	267.00	Update litigation trackers and correspondence regarding same
09/20/24	J E Bjork	2.00	4,480.00	Multiple calls with Debtor regarding strategic issues and update on mediation (1.5); review emails and call with Ken Feinberg regarding mediation (0.5)
09/20/24	KA Posin	.30	610.50	Attend call with Stout regarding claim analysis model
09/20/24	A Quartarolo	1.70	2,541.50	Telephone conference with D. Gordon and K. Posin regarding status and strategy (0.4); correspondence and telephone conferences with Stout regarding mediation analysis (0.8); email D. Luce and J. Teresi regarding pending litigation (0.2); email with C. Kiplok and D. Gordon regarding mediation analysis (0.3)
09/20/24	C M Craige	2.50	4,012.50	Correspond with HHR regarding Pfizer letter (0.1); call with L. Keefer regarding spreadsheet (0.4); revise spreadsheet (1.5); participate in zoom with Latham and Stout teams regarding settlement model (0.5)
09/20/24	J L Teresi	.80	980.00	Update litigation tracker (0.2); correspondence with Latham team regarding mediation (0.2); attend conference with Stout, J. Bjork, A. Quartarolo, K. Posin, C. Craige regarding mediation (0.4)
09/21/24	J E Bjork	.80	1,792.00	Emails with Latham team and Debtors regarding mediation and review of proposal
09/21/24	A Quartarolo	.30	448.50	Email C. Craige and K. Posin regarding claims analysis and mediation
09/21/24	C M Craige	.60	963.00	Correspond with Latham team regarding talc precedent (0.3); correspond with Latham team regarding mediation materials (0.3)
09/22/24	J E Bjork	1.10	2,464.00	Conference with Debtor regarding mediation proposal (0.7); review materials regarding same (0.4)
09/22/24	A Quartarolo	.70	1,046.50	Telephone conference with team regarding claims analysis and mediation (0.4); email K. Feinberg regarding same (0.2); email C. Craige regarding same (0.1)
09/22/24	C M Craige	.50	802.50	Zoom with Debtor, HHR and Latham teams regarding

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
				mediation proposal (0.3); correspond with Latham team regarding precedent (0.2)
09/23/24	J E Bjork	3.70	8,288.00	Prepare for (0.8) and participate in mediation session and pre-mediation conferences with Debtor (1.7); follow up with counsel for Debtor regarding settlement issues and review materials from Stout (1.2)
09/23/24	C M Craige	4.50	7,222.50	Correspond with K. Feinberg, Latham and HHR teams regarding mediation materials (0.3); analyze talc precedent (0.5); participate in zoom with K. Feinberg, Latham, and HHR teams regarding mediation (0.2); monitor Red River first day hearing (3.1); call with J Bjork regarding same (0.3); analyze response to Pfizer demand (0.1)
09/23/24	J L Teresi	1.30	1,592.50	Conference with H. Hatfield regarding discovery (0.2); conference with B. Franzoni, D. Luce, and L. McKown regarding litigation (0.7); correspond with H. Hatfield and R. Gooding regarding discovery (0.1); revise litigation tracker and draft agenda for litigation call (0.3)
09/24/24	J E Bjork	2.40	5,376.00	Multiple emails and conference with Debtor regarding mediation strategy and Pfizer-related issues (1.2); emails with Latham team related to indemnity issues and removal of pending litigation (1.2)
09/24/24	C M Craige	1.10	1,765.50	Revise expert retention letter (0.2); correspond with Latham team regarding same (0.1); analyze precedent regarding potential litigation issues (0.8);
09/24/24	J L Teresi	.30	367.50	Correspond with R. Goodings regarding discovery (0.2); correspond with L. McKown regarding document discovery (0.1)
09/25/24	J E Bjork	1.70	3,808.00	Conference with K. Feinberg regarding mediation (0.3); conference with Committee counsel and follow up conference with K. Feinberg regarding motion to dismiss and mediation (0.9); conference with Debtor regarding strategic issues (0.5)
09/25/24	J L Teresi	.50	612.50	Correspond with A. Rizkelika regarding discovery
09/26/24	J E Bjork	2.00	4,480.00	Multiple emails and conferences with Debtor regarding case related issues, financing and plan mediation (1.5); update with K. Feinberg regarding motion to dismiss (0.2); emails with committee counsel regarding same (0.3)
09/26/24	KA Posin	.60	1,221.00	Converse with Debtor and J. Bjork regarding

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
				mediation process and status
09/26/24	K D Shang	.40	356.00	Update litigation trackers and correspondence regarding same
09/27/24	J E Bjork	2.50	5,600.00	Conferences with Debtor regarding settlement issues (0.5); update on motion to dismiss and review responsive pleadings (0.8); conference with Debtor regarding strategic issues (1.2)
09/27/24	A Quartarolo	1.20	1,794.00	Telephone conference with D. Gordon and K. Posin regarding status and strategy (0.5); email with K. Posin regarding hearing on motion to dismiss (0.2); draft stipulation regarding same (0.5)
09/27/24	C M Craige	.30	481.50	Correspond with Latham and HHR teams regarding talc regulation (0.1); correspond with Latham team regarding dismissal hearing (0.2)
09/27/24	J L Teresi	.20	245.00	Correspond with R. Gooding regarding discovery
09/28/24	J E Bjork	.80	1,792.00	Emails related to motion to dismiss (0.3); emails with K. Feinberg (0.2); emails with Debtor regarding same(0.3)
09/29/24	J E Bjork	1.00	2,240.00	Emails with Latham team related to Pfizer mediation and settlement issues (0.6); conference with C. Kiplok regarding same (0.4)
09/30/24	J E Bjork	1.30	2,912.00	Multiple emails and update conference with Debtor regarding case strategy and contingency planning
09/30/24	A Quartarolo	1.20	1,794.00	Telephone conference with J. Teresi, D. Luce and B. Franzoni regarding pending litigation and related issues (0.6); correspondence regarding hearing on motion to dismiss and depositions (0.3); review dismissal of appeal (0.1); correspondence regarding same (0.2)
09/30/24	C M Craige	.60	963.00	Correspond with Latham team and client regarding venue appeal (0.2); call with R. Mishkin regarding mediation (0.2); correspond with Latham team regarding same (0.1); coordinate with Latham and HHR teams regarding motion to dismiss hearing (0.1)
09/30/24	J L Teresi	3.50	4,287.50	Conference with B. Franzoni, L. McKown, D. Luce, and A. Quartarolo regarding litigation (0.7); update litigation tracker (1.1); review documents related to discovery (1.7)

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Invoice No. 2400615951  
 October 24, 2024  
 Matter Name: Litigation

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J E Bjork	47.30	Hrs. @	\$ 2,240.00/hr.	\$ 105,952.00
KA Posin	19.00	Hrs. @	\$ 2,035.00/hr.	\$ 38,665.00
A Quartarolo	18.40	Hrs. @	\$ 1,495.00/hr.	\$ 27,508.00
C M Craige	26.20	Hrs. @	\$ 1,605.00/hr.	\$ 42,051.00
J J Weichselbaum	.30	Hrs. @	\$ 1,275.00/hr.	\$ 382.50
J L Teresi	47.30	Hrs. @	\$ 1,225.00/hr.	\$ 57,942.50
K D Shang	1.70	Hrs. @	\$ 890.00/hr.	\$ 1,513.00
D A Klabo	<u>5.70</u>	Hrs. @	\$ 760.00/hr.	<u>\$ 4,332.00</u>
	165.90			\$ 278,346.00

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Invoice No. 2400615951

October 24, 2024

Matter Name: Plan and Disclosure Statement

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/10/24	K D Shang	1.40	1,246.00	Review and summarize talc bankruptcy plan
09/11/24	J E Bjork	.70	1,568.00	Review trust procedure precedent
09/11/24	K D Shang	1.70	1,513.00	Summarize talc bankruptcy case (1.3); correspondence with Latham team regarding same (0.4)
09/15/24	KA Posin	.60	1,221.00	Review releases (0.3); draft emails to A. Quartarolo regarding same (0.3)
09/16/24	J E Bjork	1.00	2,240.00	Conference with Debtor regarding plan issues and chapter 11 case strategy
09/19/24	J J Weichselbaum	.40	510.00	Review precedent cases in connection with certain settlement / plan issues
09/23/24	C M Craige	.20	321.00	Correspond with S. Wheatman regarding solicitation timeline (0.1); correspond with D. Irgi regarding solicitation precedent (0.1)
09/25/24	C M Craige	.30	481.50	Analyze precedent decisions regarding discharge and confirmation

J E Bjork	1.70	Hrs. @	\$ 2,240.00/hr.	\$ 3,808.00
KA Posin	.60	Hrs. @	\$ 2,035.00/hr.	\$ 1,221.00
C M Craige	.50	Hrs. @	\$ 1,605.00/hr.	\$ 802.50
J J Weichselbaum	.40	Hrs. @	\$ 1,275.00/hr.	\$ 510.00
K D Shang	<u>3.10</u>	Hrs. @	\$ 890.00/hr.	<u>\$ 2,759.00</u>
	6.30			\$ 9,100.50

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Invoice No. 2400615951

October 24, 2024

Matter Name: Reports and Schedules

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/30/24	J J Weichselbaum	.50	637.50	Review MORs (0.4); emails regarding same (0.1)
J J Weichselbaum	<u>.50</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 637.50</u>
	.50			\$ 637.50

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Invoice No. 2400615951

October 24, 2024

Matter Name: Retention/Fee Matters (L&amp;W)

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/03/24	J J Weichselbaum	.20	255.00	Finalize supplemental Bjork declaration and coordinate filing
09/03/24	C M Tarrant	1.10	577.50	Review monthly fee materials
09/04/24	KA Posin	.30	610.50	Review fee application materials
09/05/24	J J Weichselbaum	.30	382.50	Review coversheet for fee statement (0.2); email with C. Tarrant regarding same (0.1)
09/05/24	C M Tarrant	1.10	577.50	Finalize July monthly fee statement
09/06/24	C M Tarrant	1.20	630.00	Review and revise monthly fee materials
09/10/24	J J Weichselbaum	.50	637.50	Prepare supplemental declaration in connection with L&W retention
09/16/24	J J Weichselbaum	.20	255.00	Review / circulate fee application
09/17/24	J J Weichselbaum	.20	255.00	Emails with K. Posin regarding parties in interest / supplemental disclosure
09/20/24	J J Weichselbaum	.90	1,147.50	Review / comment on August fee statement (0.8); emails regarding supplemental Bjork declaration (0.1)
09/24/24	C M Tarrant	1.30	682.50	Prepare august monthly fee statement
09/26/24	J J Weichselbaum	.80	1,020.00	Review Province fee statements and budget in connection with questions from client (0.3); emails regarding same with M3 and Latham teams (0.2); call with client regarding fee matters (0.3)
09/27/24	J J Weichselbaum	.30	382.50	Review monthly fee statement cover sheet and finalize for filing
09/27/24	C M Tarrant	.80	420.00	Finalize monthly fee statement for filing

KA Posin	.30	Hrs. @	\$ 2,035.00/hr.	\$ 610.50
J J Weichselbaum	3.40	Hrs. @	\$ 1,275.00/hr.	\$ 4,335.00
C M Tarrant	<u>5.50</u>	Hrs. @	\$ 525.00/hr.	<u>\$ 2,887.50</u>
	9.20			\$ 7,833.00

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Invoice No. 2400615951

October 24, 2024

Matter Name: Retention/Fee Matters/Objections (Others)

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/04/24	J J Weichselbaum	.30	382.50	Review to UCC fee statement
09/04/24	J J Weichselbaum	.20	255.00	Correspond with S. Peters regarding OCP payments
09/20/24	J J Weichselbaum	.30	382.50	Review M3 fee application (0.2); email regarding same (0.1)
09/23/24	J J Weichselbaum	.60	765.00	Review and circulate Brown Rudnick August fee statement (0.2); review / circulate FCR / YCST fee statements (0.4)
09/24/24	J J Weichselbaum	.30	382.50	Review and circulate Province fee statement (0.2); emails regarding same (0.1)
09/25/24	J J Weichselbaum	.50	637.50	Emails with M3, debtor and team regarding Province fee statement (0.2); review budget regarding same (0.3)
09/30/24	J J Weichselbaum	.40	510.00	Review supplemental declaration (0.3); emails regarding same (0.1)
J J Weichselbaum	<u>2.60</u>	Hrs. @	\$ 1,275.00/hr.	<u>\$ 3,315.00</u>
	2.60			\$ 3,315.00

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**Exhibit E**

**Expenses**

1271 Avenue of the Americas  
New York, New York 10020-1303  
Tel: +1.212.906.1200 Fax: +1.212.751.4864  
www.lw.com



**INVOICE**

October 24, 2024

BMI Oldco Inc.  
5605 North MacArthur Boulevard, Suite 1000  
PMB 139  
Irving, TX 75038  
Attn: David Gordon

Please identify your payment with the following:

Invoice No. 2400615952  
Matter Number 072806-1025

For professional services rendered through September 30, 2024

**Re:    Disbursements**

Costs and Disbursements	73,418.01
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<b>Total Due</b>	<b>\$ 73,418.01</b>
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**LATHAM & WATKINS<sup>LLP</sup>**

Invoice No. 2400615952  
October 24, 2024

**Costs and Disbursements:**

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Amount</u>
08/31/24	Docket - LA Account: 2591494	K D Shang	28.50
08/31/24	Docket - LA Account: 2591494	D A Klabo	37.80
	<b>Total Court Research</b>		<b>66.30</b>
9/30/24	Outside Services (Non-Attorney) - Stout Risius Ross, LLC - For Professional Services Rendered	C M Tarrant	62,593.00
	<b>Total Outside Services (Non-Attorney)</b>		<b>62,593.00</b>
09/10/24	Download and process data from data room	R S Goodings	1,620.00
09/11/24	Incorporated additional data into existing database records.	N Mohamed	648.00
09/11/24	Incorporate additional data into existing database records; Update database with new master date field, custodian information, or additional metadata	D Aragon	810.00
09/11/24	Perform quality checks on new documents and metadata or fielded information added to database	O Quervalu	121.50
09/11/24	Download data from data room; process data into review database	R S Goodings	1,863.00
09/18/24	Zip data from database and send to outside counsel	R S Goodings	202.50
09/24/24	Create external user account(s) with customized security settings in database for [Entity/Company Name]	A E DeLeon	445.50
	<b>Total Practice Support</b>		<b>5,710.50</b>
09/09/24	Meals - Out-of-Town - Jeffrey E Bjork - Hotel - Lunch - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24 - The Greenwich Hotel - Internal Guests: Jeffrey E Bjork	J E Bjork	5.44
09/09/24	Lodging - Out of Town - Jeffrey E Bjork - Lodging - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24 - The Greenwich Hotel - three nights	J E Bjork	1,575.00
09/09/24	Meals - Out-of-Town - Jeffrey E Bjork - Hotel - Meals Other - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/12/24 - The Greenwich Hotel - Internal Guests: Jeffrey E Bjork - External Guests: Doug Dietrich, Tom Meek, Dave Gordon, Chris Kiplok	J E Bjork	272.54

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October 24, 2024

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Amount</u>
09/09/24	Meals - Out-of-Town - Jeffrey E Bjork - Hotel - Meals Other - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/13/24 - The Greenwich Hotel - Internal Guests: Jeffrey E Bjork - External Guests: Dave Gordon	J E Bjork	143.45
09/09/24	Meals - Out-of-Town - Jeffrey E Bjork - Hotel - Meals Other - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/13/24 - The Greenwich Hotel - Internal Guests: Jeffrey E Bjork - External Guests: Dave Gordon	J E Bjork	57.15
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24 - LW NYO to Newark Airport	J E Bjork	137.38
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/11/24 - Home to LAX	J E Bjork	240.00
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/11/24 - Newark Airport to Greenwich Hotel	J E Bjork	165.00
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24 - LAX to Home	J E Bjork	240.00
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/12/24 - Hotel to Hughes Hubbard offices	J E Bjork	32.26
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/13/24 - Hotel to Midtown/LW Offices	J E Bjork	85.42
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/13/24 - LW Office to Hotel	J E Bjork	64.72

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October 24, 2024

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Amount</u>
09/09/24	Ground Transportation - Out-Of-Town - Jeffrey E Bjork - Taxi/Car Service - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24 - Hotel to LW NYO	J E Bjork	67.38
09/09/24	Airfare - Jeffrey E Bjork - - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/11/24 - LAX to Newark - UA - 09/11/2024 - 09/11/2024	J E Bjork	973.00
09/09/24	Airfare - Jeffrey E Bjork - - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24 - Newark to LAX - UA - 08/14/2024 - 09/14/2024	J E Bjork	973.47
<b>Total Travel Expenses</b>			<b>5,032.21</b>
09/09/24	Wireless Data - Jeffrey E Bjork - Internet - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/14/24	J E Bjork	8.00
09/09/24	Wireless Data - Jeffrey E Bjork - Internet - Attend meetings in NY with clients and LW team, review materials in preparation for mediation session and plan precedent structure - 08/11/24	J E Bjork	8.00
<b>Total Wireless Data</b>			<b>16.00</b>
<b>Total Costs and Disbursements:</b>			<b>\$ 73,418.01</b>
<b>Costs and Disbursements:</b>			
Court Research			66.30
Outside Services (Non-Attorney)			62,593.00
Practice Support			5,710.50
Travel Expenses			5,032.21
Wireless Data			16.00
<b>Total Costs and Disbursements:</b>			<b>\$ 73,418.01</b>

BALANCE DUE AND PAYABLE TO REMITTANCE ADDRESS UPON RECEIPT.  
PLEASE REFERENCE INVOICE #2400615952 ON YOUR PAYMENT OR RETURN A COPY OF THIS INVOICE WITH YOUR CHECK.



October 8, 2024

Barretts Minerals Inc.  
c/o David Gordon  
5605 North MacArthur Boulevard, Suite 1000, PMB 139  
Irving, TX 75038

In Reference To: Barretts Minerals, Inc.  
Project #: 2355498  
Invoice #: CINV-069397

	<u>Amount</u>
For Professional Services Rendered	\$62,593.00
Out-Of-Pocket Expenses	<u>\$0.00</u>
Invoice Total	<u><u>\$62,593.00</u></u>



Invoice Date: 10/08/2024

Invoice #: CINV-069397

Project #: 2355498

## Professional Charges

In Reference To: Barretts Minerals, Inc.

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/03/24	Carolyn DeLarm	Meet with Lily to discuss missing complaints, conduct network search to confirm we have not received such complaints.	1.10	360.00	396.00
09/03/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis	2.90	545.00	1,580.50
09/04/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis	3.30	545.00	1,798.50
09/04/24	Carolyn DeLarm	Call with Lily to discuss additional complaint review.	0.50	360.00	180.00
09/04/24	Carolyn DeLarm	Communications with Joe at LW regarding complaint filings. Download and review additional documents provided.	0.80	360.00	288.00
09/04/24	Carolyn DeLarm	Set up tracking file/processes for M. Bennett complaint review.	1.00	360.00	360.00
09/04/24	Brad Martisauski	Call with L. Keefer to discuss analysis in response to questions from mediation.	0.30	340.00	102.00
09/04/24	Brad Martisauski	Analyze BMI claims data in response to questions spawning from mediation	2.10	340.00	714.00
09/04/24	Ross Mishkin	Meeting with counsel re mediation requests	0.90	790.00	711.00
09/05/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis	3.30	545.00	1,798.50
09/05/24	Ross Mishkin	Follow up with data questions in mediation requests	0.30	790.00	237.00
09/05/24	Brad Martisauski	Analyze BMI claims data in response to questions spawning from mediation	1.90	340.00	646.00
09/05/24	Brad Martisauski	Call with L. Keefer to discuss analysis in response to questions spawning from mediation.	0.20	340.00	68.00
09/05/24	Brad Martisauski	Perform QC of B. Heuberger Updates to Current Claims Tracker Data into Valuation model.	0.80	340.00	272.00
09/05/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	2.50	290.00	725.00

Invoice #: CINV-069397

Project #: 2355498

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/05/24	Mary Bennett	Review data set and task from C.DeLarm; Track complaints in Excel.	4.00	290.00	1,160.00
09/06/24	Carolyn DeLarm	Review/QC and address questions from Mary regarding original complaint review and settlement letter review.	2.10	360.00	756.00
09/06/24	Carolyn DeLarm	Internal communication regarding files for Joe.	0.50	360.00	180.00
09/06/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	1.00	290.00	290.00
09/06/24	Brad Martisauski	Perform QC of B. Heuberger Updates to Valuation Model and Claims Tracking Schedule	0.40	340.00	136.00
09/06/24	Brad Martisauski	Perform analysis of BMI claims data in response to questions spawning from mediation.	1.10	340.00	374.00
09/06/24	Brad Martisauski	Call with L. Keefer and C. DeLarm to discuss analysis of BMI claims data in response to questions spawning from mediation.	0.40	340.00	136.00
09/06/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis	3.40	545.00	1,853.00
09/06/24	Carolyn DeLarm	Review settlement demand letters and clean up tracking file after Mary's review.	1.30	360.00	468.00
09/06/24	Mary Bennett	Review and track complaints in Excel.	4.50	290.00	1,305.00
09/07/24	Brad Martisauski	Perform analysis of BMI claims data in response to questions spawning from mediation.	0.80	340.00	272.00
09/07/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis	1.70	545.00	926.50
09/08/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis	0.40	545.00	218.00
09/09/24	Mary Bennett	Call with C.DeLarm, L.Keefer, and B.Martisauski discussing complaint review; make updates to tracker	2.00	290.00	580.00
09/09/24	Brad Martisauski	Call with L. Keefer, C. DeLarm, and M. Bennett to regroup on outstanding analyses for counsel.	0.50	340.00	170.00
09/09/24	Brad Martisauski	Correspondence with Stout team in response to counsel questions re: BMI claims data.	0.40	340.00	136.00
09/09/24	Carolyn DeLarm	Call with team relating to complaint/ settlement letter summary.	0.50	360.00	180.00



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/09/24	Carolyn DeLarm	Incorporate feedback into complaint tracker, create external version.	0.50	360.00	180.00
09/09/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis; team correspondence & discussions	4.70	545.00	2,561.50
09/10/24	Carolyn DeLarm	Update claims tracker using settlement data per request of Joe.	0.60	360.00	216.00
09/10/24	Carolyn DeLarm	Pull together requested materials/ correspondence with Joe ahead of mediation.	0.50	360.00	180.00
09/10/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis; team correspondence & discussions	2.70	545.00	1,471.50
09/11/24	Brad Martisauski	Prepare analysis of BMI claims data per correspondence with counsel in preparation to share materials with Atkinson.	0.70	340.00	238.00
09/11/24	Ross Mishkin	Claim updates and prep for mediation	0.80	790.00	632.00
09/11/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis; team correspondence & discussions	3.40	545.00	1,853.00
09/12/24	Carolyn DeLarm	Touch base with Lily regarding Joe's questions.	0.30	360.00	108.00
09/12/24	Carolyn DeLarm	Review old email correspondence/sent files to reconcile 197/202 claimant figure. Reconcile across various files. Discuss with Lily.	2.30	360.00	828.00
09/12/24	Brad Martisauski	Working session with C. DeLarm to analyze BMI claims data in response to counsel questions ahead of Friday 9/13/2024 mediation.	0.40	340.00	136.00
09/12/24	Carolyn DeLarm	Working session with B. Martisauski to analyze BMI claims data in response to counsel questions ahead of Friday mediation.	0.40	360.00	144.00
09/12/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	1.30	290.00	377.00
09/12/24	Lily Keefer	Prepare responses to mediation requests; complaint & data analysis; team correspondence & discussions	1.60	545.00	872.00
09/13/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	3.50	290.00	1,015.00
09/13/24	Ross Mishkin	Prep for mediation; mediation; follow analysis and questions	3.10	790.00	2,449.00



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/13/24	Brad Martisauski	Perform ad hoc analysis of BMI claims data for internal Stout team - case filings over time.	0.90	340.00	306.00
09/13/24	Brad Martisauski	Perform QC of B. Heuberger Updates to Current Claims Tracker Data into Valuation model.	0.90	340.00	306.00
09/13/24	Lily Keefer	BMI Mediation; Follow-up analysis & correspondence;	3.30	545.00	1,798.50
09/16/24	Carolyn DeLarm	Call with Brad and Lily to walk through outstanding BMI tasks.	0.50	360.00	180.00
09/16/24	Carolyn DeLarm	Set up review for Mary related to the new filings to incorporate into Pfizer claim data.	1.00	360.00	360.00
09/16/24	Carolyn DeLarm	QC Mary's review of additional claim data.	0.80	360.00	288.00
09/16/24	Mary Bennett	Review of additional complaint documents	2.50	290.00	725.00
09/16/24	Brad Martisauski	Call with L. Keefer and C. DeLarm to regroup on status of BMI engagement and to-dos following Friday 9/13 mediation.	0.50	340.00	170.00
09/16/24	Brad Martisauski	Perform QC of B. Heuberger Updates to Current Claims Tracker Data into Valuation model.	0.60	340.00	204.00
09/16/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	4.40	290.00	1,276.00
09/16/24	Lily Keefer	Prepare responses to mediation requests; data analysis; modeling analysis	4.30	545.00	2,343.50
09/17/24	Brad Martisauski	Morning meeting with L. Keefer and B. Heuberger to discuss analysis of BMI claims data per counsel request.	0.70	340.00	238.00
09/17/24	Brad Martisauski	Follow-up meeting with B. Heuberger to discuss analysis of BMI claims data per counsel request.	0.40	340.00	136.00
09/17/24	Brad Martisauski	Afternoon check-in with L. Keefer and B. Heuberger to discuss analysis of BMI claims data per counsel request.	0.30	340.00	102.00
09/17/24	Brad Martisauski	Prepare modeling updates to incorporate analysis of BMI claims data per counsel request.	1.30	340.00	442.00
09/17/24	Brad Martisauski	Perform QC of B. Heuberger analysis of BMI claims data.	0.80	340.00	272.00
09/17/24	Bryn Heuberger	Internal meeting with L. Keefer and B. Martisauski	0.70	290.00	203.00
09/17/24	Bryn Heuberger	Internal meeting with B. Martisauski	0.40	290.00	116.00



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/17/24	Bryn Heuberger	Internal meeting with L. Keefer and B. Martisauski	0.40	290.00	116.00
09/17/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	4.50	290.00	1,305.00
09/17/24	Lily Keefer	Prepare responses to mediation requests; data analysis; modeling analysis	3.60	545.00	1,962.00
09/18/24	Ross Mishkin	Estimation updates and meet with counsel	2.10	790.00	1,659.00
09/18/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	0.50	290.00	145.00
09/18/24	Lily Keefer	Data & modeling analysis	5.30	545.00	2,888.50
09/19/24	Ross Mishkin	Further Estimation updates. cash flow model, and meet with counsel	3.40	790.00	2,686.00
09/19/24	Lily Keefer	Data & modeling analysis; cash flow analysis; discussions w/ Latham team	4.40	545.00	2,398.00
09/20/24	Ross Mishkin	Further Estimation updates. cash flow model, and meet with counsel	2.50	790.00	1,975.00
09/20/24	Lily Keefer	Cash flow analysis; discussions w/ Latham team	4.40	545.00	2,398.00
09/24/24	Lily Keefer	Data analysis; meeting w/ Brad	1.30	545.00	708.50
09/26/24	Brad Martisauski	Perform QC of B. Heuberger Updates to Current Claims Tracker Data into Valuation model.	0.80	340.00	272.00
09/26/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	3.00	290.00	870.00
09/27/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	2.00	290.00	580.00
09/28/24	Bryn Heuberger	Update Current Claims Tracker Data into Valuation model.	2.00	290.00	580.00
09/30/24	Brad Martisauski	Perform QC of B. Heuberger Updates to Current Claims Tracker Data into Valuation model.	0.90	340.00	306.00
Total			139.10		\$62,593.00





### Professional Charges Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ross Mishkin	Managing Director	13.10	790.00	10,349.00
Lily Keefer	Director	54.00	545.00	29,430.00
Carolyn DeLarm	Manager	14.70	360.00	5,292.00
Brad Martisauski	Associate	18.10	340.00	6,154.00
Bryn Heuberger	Analyst	26.20	290.00	7,598.00
Mary Bennett	Analyst	13.00	290.00	3,770.00
Total Professional Charges				\$62,593.00